

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE:	Gerald R. Galleshaw	:	
	Debtor	:	
		:	
DAVID C. FRAIOLI and NEW		:	
ENGLAND AUTO CENTER, INC.		:	
	Plaintiffs	:	CASE NO: 15-11047
		:	
V.		:	
		:	CHAPTER 7
		:	
GERALD R. GALLESHAW,		:	ADV. PRO. NO.: 15-01023
	Defendant	:	

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS ADVERSARY COMPLAINT**

Now comes the Plaintiffs, David C. Fraioli ("Mr. Fraioli") and New England Auto Center, Inc. ("NEAC") ("Mr. Fraioli and NEAC at times may collectively be referred to as "Plaintiffs") and request a brief extension of time, to February 15, 2016 to file a response to Defendant, Gerald R. Galleshaw's ("Defendant") Motion to Dismiss Adversary Complaint ("Motion"). As grounds, Plaintiffs need some additional time to prepare an adequate response to Defendant's Motion.

Wherefore, Plaintiff's respectfully request that extension of time, up to and including, , February 15, 2016 be allowed to file a response to Defendant's Motion to Dismiss Adversary Complaint.

David Fraioli and New England Auto Center, Inc.
By his Attorneys,

/s/ Ryanna T. Capalbo
Andrew R. Bilodeau, Esq., #7174
Ryanna T. Capalbo, Esq., #8314
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Date: 2/1/2016

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATION

I hereby certify that on the 1st day of February, 2016, I electronically filed a true and accurate copy of the within document to be sent via electronic means with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System and via email to the following:

Todd Dion, Esq.
Law Office of Todd S. Dion
1599 Smith Street
North Providence, RI 02911

/s/ Ryanna T. Capalbo, Esq.
Ryanna T. Capalbo, Esq., #8314